

Review of Food Withdrawal and Recall Processes

Data Analysis of FSA Food Alerts

2013 - 2016



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Introduction

1. An analysis of FSA food alerts that were related to food recalls for food safety reasons was conducted to broadly characterise their major features and investigate trends over time. The FSA will issue a Product Recall Information Notice (PRIN) on notification that a food product is being 'recalled'. Allergy Alerts are also issued in cases where foods are being recalled, either because the allergy labelling is missing or incorrect, or if there is any other risk specific to consumers with an intolerance or a food allergy. Throughout this report a reference to a food alert relates to a food recall. (Only a small proportion of food incidents reported to the FSA result in a recall and a corresponding FSA food alert being issued).

Methodology

2. A list of FSA Food Alerts for the years 2013 to 2016 inclusive was collated. Only Allergy Alerts and Product Recall Information Notices related to recalls and issued by the FSA were included in the analysis. The analysis specifically excluded:
 - Any updates to existing alerts.
 - Allergy Alerts explicitly recorded as being related to withdrawals rather than recalls. (However, this distinction is no longer used as all Allergy Alerts are effectively a targeted recall of the product from consumers with relevant allergies and are considered as recalls).
 - Food alerts made by Food Standards Scotland since its creation in 1 April 2015. (Prior to this date, food alerts relating to recalls in any part of the UK are included in the analysis. Subsequently, recalls only affecting Scotland would not be covered.)
3. In the period from 2013 to 2016 inclusive, there were 381 food alerts. Each of these alerts was matched to an incident from the FSA's Incident database. This allowed the alerts to be broken down by several fields of interest.

Summary of findings

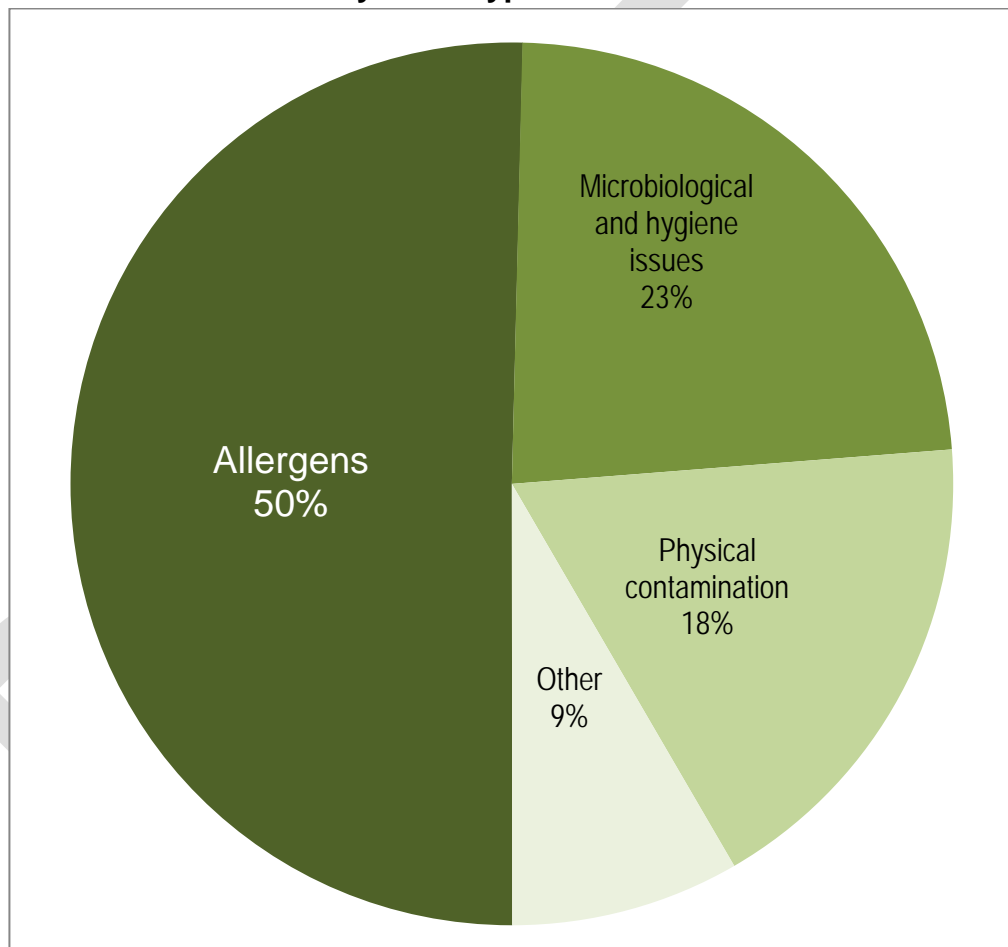
4. A summary of the key findings are:
 - Half of food alerts from 2013 to 2016 are related to Allergens. Most of the rest related to Microbiological and hygiene issues or to physical contamination.
 - The number of food alerts in each of 2015 and 2016 is more than double that seen in the previous two years. An increase over time is seen in all issue types.
 - Most UK food alerts involved products originating in the United Kingdom. However, the proportion originating from the rest of the EU was larger in 2015 and 2016 than in 2013 and 2014.
 - Almost 90% of food alerts involved incidents that were reported to the FSA by either industry or local authorities. About 62% of food alerts were issued within a day of the FSA being notified and 87% were issued within a week.

- Apart from large supermarket chains, the frequency of food alerts issued by the FSA was usually lower than one per year per company.
- Food alerts involve a wide number of food commodities and businesses with no sector being obviously predominant.

Number of FSA food alerts by issue type, 2013-2016

5. The numbers of FSA food alerts by type over the period 2013-2016 are illustrated in chart 1.

Chart 1 – Food alerts by recall type

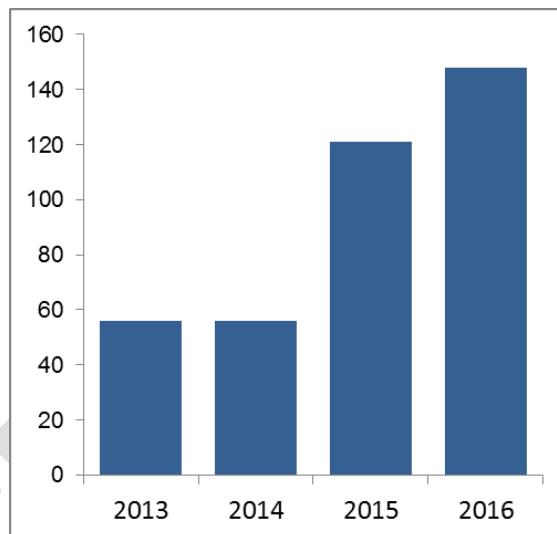


6. About half (50%) of food alerts from 2013 to 2016 are associated with allergens. Almost a quarter of the alerts (23%) relate to microbiological and hygiene issues, including pathogenic and non-pathogenic micro-organisms and problems related to poor or insufficient controls implemented in food business. Another 18% of food alerts are associated with physical contamination of food (including defective packaging). The remainder related to other issues including labelling, composition and organoleptic aspects.

Number of FSA food alerts by year, 2013-2016

7. The frequency of UK food alerts has increased in recent years. There were 56 food alerts issued in both 2013 and in 2014. The frequency in 2015 and 2016 was more than double that (121 and 148 food alerts respectively).
8. Furthermore, the increase may be slightly under-estimated. The exclusion of FSS food alerts means that Scotland-only alerts would contribute to the totals in 2013 and 2014 but not to the totals for 2014 and 2015.
9. The cause of the trend over time is not known. The increase in such alerts does not differ greatly by issue type or notifier. However, some of the change over time might be attributable to the introduction of new EU regulations on allergen ingredients labelling in December 2014.

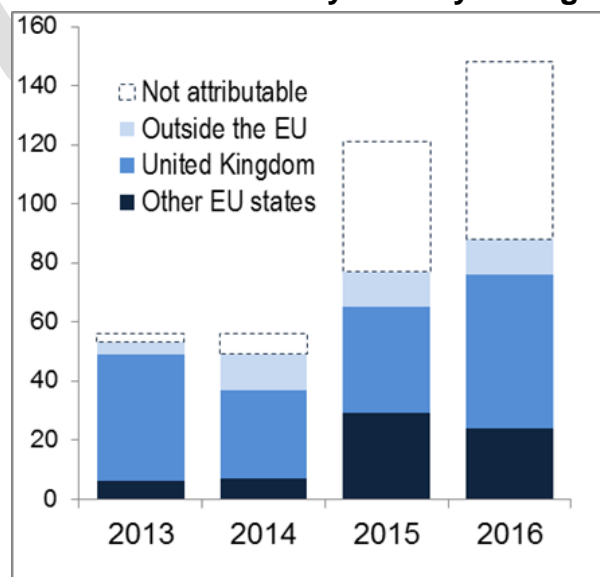
Chart 2 – Food alerts per annum



Numbers of FSA food alerts by country of origin

10. In 2013 and 2014, at least 65% of food alerts involved products originating in the United Kingdom. UK products also accounted for a large proportion of the alerts in 2015 and 2016.
11. However, due to data management changes, almost 40% of food alerts could not be attributed to a country of origin in 2015 and 2016. This makes it difficult to estimate numbers for this period or to characterise trends over time. Nevertheless, there appears to be an increase in the proportion of products from other EU member states to some degree.

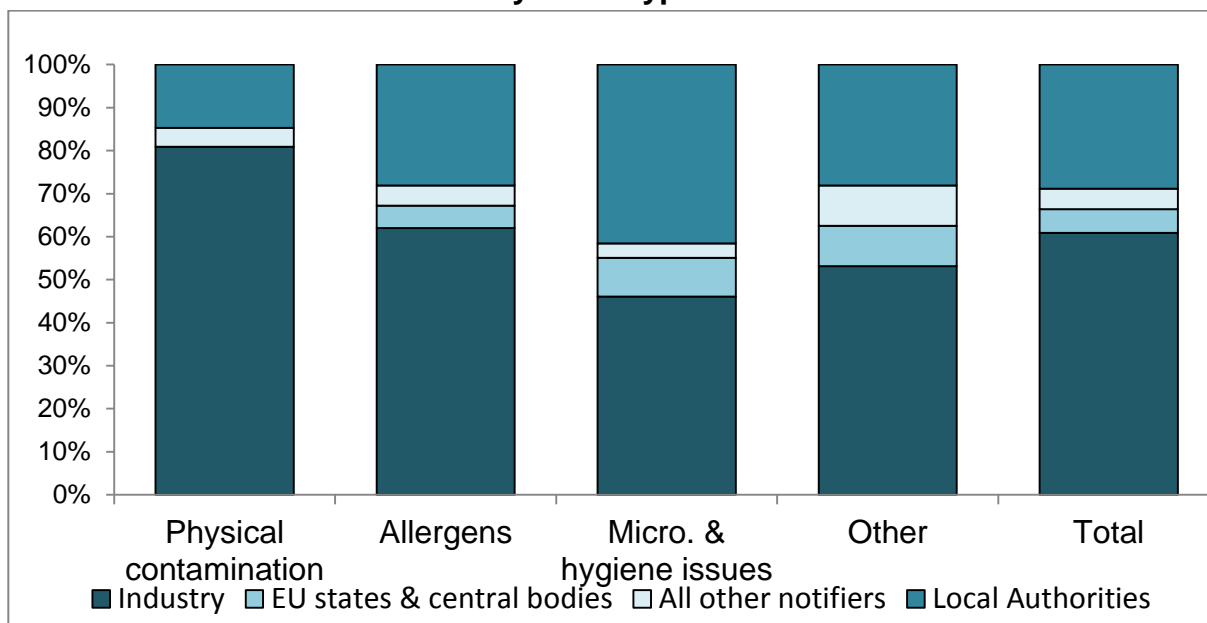
Chart 3 – Food alerts by country of origin



Proportion of FSA food alerts by notifier, for each issue type, 2013-2016

12. From 2013 to 2016, 61% of the alerts originated in an incident notified by industry. Notifications by local authorities accounted for most of the other alerts (29%). Just 5% of food alerts were related to incidents notified by EU states & central bodies. A similar number were notified by others including laboratories, government organisations, and members of the public.

Chart 4 – Source of notification by recall type



13. Furthermore, there appears to be a relationship between the issue and the notifier. Of the physical contamination food alerts, 81% were associated with notification by industry. Just 15% of such alerts were associated with notification by Local Authorities. In contrast, Microbiological & hygiene food alerts were roughly equally likely to have originated in an incident reported by these two notifier groups.

Numbers of FSA food alerts by food commodity type

14. Food alerts involved a wide number of food commodities over the period from 2013 to 2016. The most common food commodities varied depending on the issue type of the alert. Milk & Milk Products accounted for 26% of Microbiological & hygiene food alerts; much more than any of the other food categories. In contrast, most allergen-related alerts were associated with “Cereals & Bakery Products” “Prepared Dishes & Snacks”; “Confectionary” or “Soups, Broths, Sauces & Condiments”.

Table 1 - Number of FSA food alerts by food commodity & issue type, 2013-2016

Food commodity	Allergens	Micro. & hygiene issues	Physical contamination	Other	Total
Cereals & Bakery Products	38	3	8		49
Milk & Milk Products	9	23	4	3	39
Prepared Dishes & Snacks	24	7	4	1	36
Confectionery	20	7	8		35
Soups, Broths, Sauces & Condiments	21	4	3	3	31
Fruits & Vegetables	16	6	3	3	28
Meat & Meat Products (Other Than Poultry)	9	5	2	8	24
Fish & Fish Products	8	9	2	2	21
Nuts, Nut Products & Seeds	12	2	4		18
Other Food Product / Mixed	10	3	1	1	15
All other food commodity categories	25	20	29	11	85
Total	192	89	68	32	381

Breakdown by Brand/Company

15. Each recall involves products identified with either the name of a brand, manufacturer or a retailer. Therefore, it is possible to determine businesses that have been involved in multiple recalls. During the four year period from 2013 to 2016, 198 brands/companies were associated with one recall-related food alert each. Another 27 brands/companies were associated with two or three alerts each (59 recalls in total).
16. Only 12 companies were associated with four or more food alerts. (All but one of these companies were large supermarket chains. This may reflect the large market share of supermarkets and their products.) This indicates that recalls for food safety reasons occur with a frequency of less than once a year for all but a handful of companies.

Time taken from notification to FSA and issue of FSA food alert

17. The FSA database records both the date when the FSA is notified of an incident, and the date when the FSA issues a public recall food alert. The difference between these two dates provides some indication of the time taken to informing the wider public.
18. About 62% of food alerts were issued within a day of the FSA being notified of the underlying incident, and 87% were issued within a week. However, 7% of food alerts were issued more than a week after incident notification. Reasons could include

incomplete information being received and further investigations being necessary to determine risk and to provide relevant information to inform the public.

Limitations of the data analysis

19. The purpose of the analysis was to provide an overall view of the major features in food alerts related to recalls. The data used in the analysis is recorded for day-to-day management purposes by staff dealing with incidents. Due to time pressures, and no regular checking, some errors may occur in this data. Therefore, the results should not be treated as exact counts of each type of recall.
20. The data analysis is not intended to be exhaustive. Much more information is recorded for each food alert, but not always in a complete, consistent or structured fashion. Consequently, considerable resource and expert knowledge would often be needed to conduct further analysis.

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